

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

LBRY, INC.,

Defendant.

Civil Action No. 1:21-cv-00260-PB

MOTION TO ADMIT JOHN E. DEATON *PRO HAC VICE*

Amicus Curiae, Naomi Brockwell (“Brockwell”), respectfully moves this Court to admit John E. Deaton, *pro hac vice*, pursuant to Local Rule 83.2(b). In support of this motion, Brockwell states:

1. The attached supporting affidavit, pursuant to Local Rule 83.2(b)(1), attests that Attorney Deaton is a member in good standing of the bars of the states of Connecticut, Iowa, Rhode Island, the Commonwealth of Massachusetts, and the United State District Court of the District of Rhode Island and the United States Court of Appeals for the First Circuit. Attorney Deaton is not currently suspended or disbarred in any jurisdiction, and there are no previous or pending disciplinary proceedings against me in any state or federal court. He has no prior felony or misdemeanor criminal convictions. Lastly, he has never been denied an application *pro hac vice*, nor has any court ever revoked such status.

2. Pursuant to Local Rule 83.2(b)(2), the fee for admission is being paid simultaneously with the filing of this motion.

3. This motion is supported entirely by the accompanying affidavit and the points made above, and therefore does not require a memorandum pursuant to Local Rule 7.1(a)(2).

WHEREFORE, Brockwell respectfully requests that the Court admit John E. Deaton *pro hac vice*.

Dated: December 20, 2022

Respectfully submitted,
NAOMI BROCKWELL
By her Attorney,
/s/ William S. Gannon
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CERTIFICATE OF SERVICE

I hereby certify that, on December 20, 2022, I caused true and correct copies of the foregoing to be served on counsel of record for all parties that have appeared to date through the Court's CM/ECF system.

/s/ William S. Gannon